EnzymaticTherapy

NATURAL MEDICINES®

January 21, 2004

Office of Nutritional Products, Labeling & Dietary Supplements, HFS 810 Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH
		THE CLAIM REFERS
Pure Core™	Dietary Supplement for sustainable support of overall good health*	Vitamin A (as natural beta carotene with mixed carotenoids), Vitamin C (ascorbic acid), Vitamin E (as d-alpha tocopheryl succinate), Thiamin (as thiamin hydrochloride), Riboflavin (as riboflavin 25 mg, riboflavin-5'-phosphate 10mg), Niacin (as niacinamide, Niacinol®), Vitamin B 6 (as pyridoxine HCl 50mg, pyridoxal-5'-phosphate 10 mg), Folic Acid, Vitamin B 12 (as cyanocobalamin), Biotin, Panthothenic Acid (as calcium pantothenate), Calcium (as calcium lysinate, aspartate, citrate), Magnesium (as magnesium aspartate, citrate, glycinate, lysinate, aspartate, glycinate, Selenium (as selenium aspartate, glycinate, lysinate complexes), Copper (as copper
975	0162 LET 13647	citrate, aspartate, glycinate, lysinate), Manganese (as manganese aspartate, lysinate, citrate, glycinate), Chromium (as chromium glycinate, aspartate,

825 Challenger Drive Green Bay, WI 54311-8328 Ph: 920-469-1313

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	lysinate), Molybdenum (as molybdenum aspartate, glycinate, lysinate), Potassium (as potassium chloride), Choline (as choline bitartrate), Inositol, Vanadium (as vanadium aspartate, glycinate, lysinate)
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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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Bv:		
DY.		

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/21/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Chief Financial Officer

EnzymaticTherapy

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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Pure Core™	Pure Core (Multiplex), for sustainable support of overall good health,* provides a full range of vital nutrients for the daily energy and essential nutrition that every active person needs.*	Vitamin A (as natural beta carotene with mixed carotenoids), Vitamin C (ascorbic acid), Vitamin E (as d-alpha tocopheryl succinate), Thiamin (as thiamin hydrochloride), Riboflavin (as riboflavin 25 mg, riboflavin-5'-phosphate 10mg), Niacin (as niacinamide, Niacinol®), Vitamin B 6 (as pyridoxine HCl 50mg, pyridoxal-5'-phosphate 10 mg), Folic Acid, Vitamin B 12 (as cyanocobalamin), Biotin, Panthothenic Acid (as calcium pantothenate), Calcium (as calcium lysinate, aspartate, citrate), Magnesium (as magnesium aspartate, citrate, glycinate, lysinate, aspartate, glycinate, lysinate, complexes), Copper (as copper citrate, aspartate, glycinate, lysinate, lysinate, citrate, glycinate), Manganese (as manganese aspartate, lysinate, citrate, glycinate), Chromium (as chromium glycinate, aspartate, aspartate,

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Pure Core 2e

	lysinate), Molybdenum (as molybdenum aspartate, glycinate, lysinate), Potassium (as potassium chloride), Choline (as choline bitartrate), Inositol, Vanadium (as vanadium aspartate, glycinate, lysinate)
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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

n	RUPPUL
By:	

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/21/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely

Michael P. Devereux Chief Financial Officer